

**Local Work Instruction:****Transocean Polar Pioneer: Deck Drainage Discharge – D002****Approved By:****Scope:****Issue Date:****Revision level:****Written By:****Revised By:****Revision/Review****Date:****Next Review Date:**

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**SCOPE:**

This document offers work level instructions for the sampling, testing, and reporting associated with the discharge of deck drainage while operating under the guidelines of the NPDES General Permit (AKG-28-8100), on-board the Transocean *Polar Pioneer*. The deck drainage system is designed to capture spills, leaks, wash water, seawater, drillings fluids and rain water. The current design and management system on the Transocean *Polar Pioneer* has the ability to process deck drainage through a deck drainage processor, which includes an oil-water separator, prior to discharging overboard. As fluid accumulates on exposed decks, it flows through various drains and into storage tanks. The fluid can be discharged directly overboard if it meets effluent discharge limitations. Fluid from areas likely to exceed permit limitations will be collected and segregated from uncontaminated water. Contaminated water will be either stored for onshore disposal or treated on-board for discharge to receiving waters.

The helicopter deck is designed with the deck itself being a containment vessel. In the case of precipitation, the helicopter deck scuppers can be opened and the deck drainage discharged.

**RESPONSIBILITY:**

The M-I SWACO NPDES Compliance Specialist is responsible for ensuring that this LWI has been provided to each person involved with this task. Any personnel that may perform the tasks outlined in this document must be familiar with the process, before the rig begins operating under NPDES regulations. Prior to drilling, the M-I SWACO NPDES Compliance Specialist will perform a pre-operational inspection and weekly inspections during drilling. Visual inspections of deck drainage areas are to verify proper operation and to document any signs of pipe leaks or spills. M-I SWACO NPDES Compliance Specialist will record deck drainage per discharge, inspection observations and submit reports to Shell. Transocean personnel are responsible for operating and repairing equipment associated with this discharge.

**1.0 References:**

- 1.0 NPDES GP AKG-28-8100:
  - 1.0.1 Table 3 – *Effluent Limitations and Monitoring Requirements for Deck Drainage (D002)*.
- 1.1 Figure – Discharge Points (Harris Pye).
- 1.2 Westfalia Bilge Master 5000 Operations Manual.
- 1.3 Polar Pioneer Best Management Practices Plan, April 2015.
- 1.4 Polar Pioneer Quality Assurance Project Plan, April 2015.
- 1.5 M-I SWACO (or Misc.) Standard Operating Procedures: 1006, 2001, 2003, 2008, 3005, 3004, 2012, ENV001.01, TOX045.02, TOX002.05, TOX012.06, TOX014B.02, TOX043.06, Section 2.4.3
- 1.6 M-I SWACO LWI - Chemical Inventory and Additives Use Management.

Document Number:

Print Date: 5/10/2015

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## 1.7 Shell Exploration & Production Company Alaska Venture 2015 Polar Pioneer Waste Management Plan.

### 2.0 General Requirements:

- 2.0 The M-I SWACO NPDES Compliance Specialist is responsible for discharge sampling, testing, and reporting to the Shell Environmental Department while operating under NPDES GP AKG-28-8100.
- 2.1 Shell Environmental Department is responsible for maintaining the Discharge Monitoring Report (netDMR) and submitting to EPA all discharges sampling, testing and results on a monthly basis.
- 2.2 Transocean is responsible for operating and repairing all equipment associated with this discharge.

### 3.0 Safety Guidelines:

- 3.0 Before any operations can take place, all personnel involved in this process must complete the following details if required by operator or contractor:
  - 3.0.1 The Pre-Tour Meeting is when daily activities are discussed.
  - 3.0.2 Written Risk Assessment with all involved parties present.
  - 3.0.3 After action, review Risk Assessment.
  - 3.0.4 Transocean Permit to Work.

### 4.0 Discharge / Task Description:

- 4.0 Deck drainage from areas unlikely to be contaminated will be discharged to receiving waters.
- 4.1 Contaminated deck drainage other than that contaminated with oil will be stored onboard prior to transfer for on-shore disposal.
- 4.2 Deck drainage from areas with the potential to be contaminated are collected and directed to deck drainage collection tanks.
- 4.3 Potentially oil-contaminated deck drainage will be pumped to Tank P-17. Deck drainage collected determined to not be contaminated will be discharged to receiving waters. Deck drainage determined to be oil-contaminated will be processed through the Bilge Master 5000 will also be sampled and tested prior to being discharged. The Bilge Master 5000 is an oil-water separator that processes the deck drainage to less than 15 ppm.
- 4.4 Captured used oil processed through the oil-water separator is stored in the Used Oil tank for on-shore disposal.
- 4.5 Effluent from the oil-water separator with more than 15 ppm is sent back to Tank P-17 for further processing.
- 4.6 Effluent from the oil-water separator that is less than 15 ppm and is within permit limitations will be discharged per NPDES regulations.
- 4.7 The M-I SWACO NPDES Compliance Specialist will immediately report to Shell Environmental Department, at 907-830-7435, of any upset condition.

### 5.0 Sampling Plan for Deck Drainage (D002):

Effluent Parameter	Units	Effluent Limitations	Monitoring Requirements/Sample Frequency
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pH	s.u.		Monthly sample
Free oil		No discharge	Grab sample and visual per discharge event
Total Volume (gal)	-	Report	Monthly estimate
TAqH	µg/L	Report	Grab sample per discharge event
TAH	µg/L	Report	Grab sample per discharge event
WET	TU <sub>c</sub>	Report	II.A.13.g.1.(page 22) and II.A.13.n.(page 26) of the NPDES GP

**6.0 Clean-up:**

6.0 Follow housekeeping practices.

**7.0 Contingency:**

7.0 Notify the Transocean Marine Department and Maintenance Department if any equipment is not working properly.

7.1 To make storage space available, fluids will be transferred to offshore supply vessels for on-shore disposal. ■

**Revision Log:**

<b><u>Date:</u></b>	<b><u>Document History:</u></b>	<b><u>Revised/reviewed by:</u></b>	<b><u>Location:</u></b>